

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

MARILYN ECHEVARRIA DE PEÑA \*  
Plaintiff \*  
\*  
\*  
\* CIVIL NO. : 11-1388 (PG)  
vs. \*  
\*  
UNITED STATES OF AMERICA, ET AL \*  
\*  
\*  
\*  
Defendants \*  
\*  
\*\*\*\*\*

**MOTION REQUESTING EXTENSION OF TIME**

TO THE HONORABLE COURT:

Plaintiff, through the undersigned legal counsel, respectfully states, alleges, and prays as follows:

1. Defendants have filed a "Motion for Change of Venue", (Docket 16).
2. The undersigned has recently returned from a holiday vacation; hence, it is, respectfully, requested that the Honorable Court grant an extension of time of twenty days to respond to defendant's, motion, that is on or before January 23<sup>rd</sup>, 2012. Further, since various matters of law have been raised, it would be out of kilter to respond without a diligent research on the matters raised.

**WHEREFORE**, plaintiff, respectfully, requests the Honorable Court grant the extension herein requested, subject to any other pronouncement the Court deems just and appropriate.

Respectfully, submitted, in San Juan, Puerto Rico, this January 3<sup>rd</sup>, 2012.

I hereby certify that on this date I filed the present document with the Clerk of the Court through the Court's CM/ECF system which will send notice of such filing to all counsels of

**Motion Requesting Extension of Time**  
**Civil No. 11-1388 (PG)**  
**January 3<sup>rd</sup>, 2012**

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record.

S/ Erick Morales-Pérez, Esq.  
USDC-PR 203211

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